



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

DAS:KKO
F.#2009R00637

271 Cadman Plaza East

Brooklyn, New York 11201

October 4, 2011

By FedEx and ECF

TO: All Counsel of Record
(See attached list of recipients)

Re: United States v. Mousa Khouli, et al.
Criminal Docket No. 11-340 (ERK)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure the government hereby produces discovery with respect to the above-captioned case. This letter supplements the government's general discovery letters of August 11, 2011, August 12, 2011 as well as discovery letters to individual counsel on additional dates as noted on the public docket. The government reiterates its request for reciprocal discovery.

Documents

The government hereby encloses three compact discs ("CDs") labeled KHOULI 3639 through KHOULI 3641 which contain e-mail records for the account "JLewis8902@aol.com." The government also encloses two CDs labeled KHOULI 3642 and KHOULI 3643 which contain e-mail records for the account "windsorant@yahoo.com." These e-mail records were obtained pursuant to the July 17, 2009 and April 8, 2010 search warrants that were previously produced in discovery and bear Bates numbers KHOULI 1957-76 and KHOULI 2011-50.

Requested material

In a September 29, 2011 letter, defendant Lewis requested that the government produce "the GJ Associates report prepared for Chartis with respect to Mr. Lewis's property this summer." Docket no. 38, at 1. The government is not in possession of this document. Further, the government has produced all of the documents provided to the government by Chartis via both formal Rule 16 discovery (KHOULI 2768-3299, KHOULI 3637) and informal discovery (CHARTIS 121-54 and 165-77).

In the same letter, counsel for Lewis requested an explanation for the redaction of material from the first search warrant application. Docket no. 38, at 1, n.1. This material was redacted because it pertains to an ongoing investigation that is not related to this case.

If you have any questions or further requests, please do not hesitate to contact me.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: /s/ Karin K. Orenstein
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Enclosures

cc: Clerk of Court (ERK) (w/o enclosures)

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